

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:	}	
	}	Case No. 18-30584-KLP
Natalie Walker	}	
	}	
	}	Chapter 13
	}	
Debtor	}	
Address:		20304 Stone Wood Manor Drive
		Petersburg, VA 23803
SSN:		xxx-xx-6863

NOTICE OF MOTION

Natalie Walker, (“Debtor”), by counsel, has filed a Motion to Incur Debt, Motion to Expedite and Motion to Shorten Notice Period.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before you or your attorney must:

File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Room 4000
Richmond, VA 23219**

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
Richmond, VA 23219
(804) 644-4878 (T)
(804) 644-4874 (F)
jmassie@massielawfirm.com

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You must also mail a copy to:

Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125

Attend a hearing scheduled for August 21, 2019 at 10:00 am at Judge Phillips at 701 E. Broad Street, Room 5100, Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2019, I sent, electronically, or mailed a true and exact copy of the foregoing **Notice of Motion** to all necessary parties.

August 8, 2019

RESPECTFULLY SUBMITTED

Natalie Walker

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

Massie Law Firm, PC
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EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Natalie Walker

Case Number 18-30584-KLP

Chapter 13

Debtor

MOTION TO EXPEDITE HEARING

COMES NOW, Natalie Walker, the Debtor, by Counsel, and offer the following in support of his **Motion to Expedite Hearing** on the **Motion for Authority to Incur Indebtedness**:

1. On February 8, 2018, Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 **et seq.**
2. Debtor seeks permission to have an Expedited Hearing on the **Motion for Authority to Incur Indebtedness**.
3. That an expedited hearing on the Motions are necessary for the following reason: **Debtor does not have transportation for work.**
4. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited bases to consider the **Motion for Authority to Incur Indebtedness** and for such other and further relief as the Court deems proper.

August 8, 2019

RESPECTFULLY SUBMITTED,

Natalie Walker

By: /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

(804) 644-4874 (F)

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In re: Natalie Walker

Case Number 18-30584-KLP

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Debtor

CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

August 8, 2019

RESPECTFULLY SUBMITTED,

Natalie Walker

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street
Richmond, VA 23219-2125
(804) 644-4878 (T)
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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2019, I sent, electronically, or mailed a true and exact copy of the foregoing **Motion to EXPEDITE HEARING** to all necessary parties.

August 8, 2019

RESPECTFULLY SUBMITTED

Natalie Walker

By /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

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In re: Natalie Walker

Case Number 18-30584-KLP

Chapter 13

Debtor

MOTION TO SHORTEN NOTICE PERIOD

COMES NOW, Natalie Walker, (“the Debtor”), by Counsel, and file this Motion to Shorten the Notice Period for the Motion for Authority to Incur Indebtedness pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully state the following:

Jurisdiction

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

Facts

4. On February 8, 2018, the Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § §1301 **et seq.**
5. Debtor seeks to shorten the notice period for the **Motion for Authority to Incur Indebtedness** from twenty-one (21) days to thirteen (13) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion for Authority to Incur Indebtedness**

August 8, 2019

RESPECTFULLY SUBMITTED,

Natalie Walker

By: /s/: Joseph Massie, III
Joseph Massie, III

Massie Law Firm, PC

Joseph Massie, III, Esquire (Bar No. 35472)

115 N. 1st Street

Richmond, VA 23219

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Chapter 13

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Richmond, VA 23219-2125
(804) 644-4878 (T)
(804) 644-4874 (F)

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2019, I sent, electronically, or mailed a true and exact copy of the foregoing **Motion to SHORTEN NOTICE** to all necessary parties.

August 8, 2019

RESPECTFULLY SUBMITTED

Natalie Walker

By /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

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Chapter 13

Debtor

MOTION FOR AUTHORITY TO INCUR INDEBTEDNESS

COME NOW, the Debtor, Natalie Walker, by counsel, and in support of her request Motion for Authority to Incur Indebtedness, states as follows:

1. The Debtor is requesting authority to incur indebted with, for the purchase of 2010 Lexus ES 350 4D Luxury Sedan or like vehicle in the approximate amount not to exceed **\$8,023.76**, and with an interest rate not to exceed **19.99%**, **5 years (60 months)** with monthly payments of **\$360.66 per month**.
2. Said purchase is necessary as the Debtor is in need of vehicle to drive to work.
3. Said indebtedness will not impair the Debtor's ability to comply with the terms of Chapter 13 Plan.

WHEREFORE, the Debtor requests an Order authorizing them to incur said indebtedness and for such other relief as the Court may deem appropriate.

August 8, 2019

RESPECTFULLY SUBMITTED,
Natalie Walker

By: /s/: Joseph Massie, III
Joseph Massie, III
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Richmond, VA 23219-2125
(804) 644-4878 (T)
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August 8, 2019

RESPECTFULLY SUBMITTED

Natalie Walker

By /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1st Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

(804) 644-4874 (F)

Natalie Walker

20304 Stone Wood Manor Drive

Petersburg, VA 23803

Carl Bates

PO Box 1819

Richmond, VA 23219

Credit Acceptance 25505

W.

12 Mile Rd.

Southfield, MI 48034

US Trustee

John P. Fitzgerald, III

701 E. Broad Street, Ste. 4304

Richmond, VA 23219

Massie Law Firm, PC

Joseph Massie, III, Esquire (Bar No. 35472)

115 N. 1st Street

Richmond, VA 23219

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Chapter 13

Biorefernce Lab
P.O. Box 21134
New York, NY 10087-1134

Bogese Asset Management

Chesterfield Community Service
P.O. Box 92
Attn: Accounts Receivable

Chesterfield, VA 23832-0001
Cig Financial
6 Executive Circle Ste 100
Irvine, CA 92614

Collection Service C
250 Mt Lebanon Blvd
Pittsburgh, PA 15122

Focused Recovery Solutions
9701-Metropolitan Ct
Ste B
Richmond, VA 23236

IRS
P.O. BOX 7346
Philadelphia, PA 19101

Mccarthy Burgess & Wol
26000 Cannon Rd
Cleveland, OH 44146

Medical Data Systems Inc
Mds
2001 9th Ave Ste 312
Vero beach, FL 32960

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Office of US Trustee
701 E. Broad Street
Suite 4300
Richmond, VA 23219

OneMain Financial
Attn: Bankruptcy Department
601 Nw 2nd St #300
Evansville, IN 47708

Receivable Management Systems
PO Box 8630
Richmond, VA 23226

Rfc 1212
Synch/nations
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

The Foot Center
5311 Patterson Avenue Ste 110
Richmond, VA 23226

Transworld Systems
500 Virginia Drive, Ste 514
Fort Washington, PA 19034

Valley Credit Service, Inc
Po Box 2162
Hagerstown, MD 21742

Wakefield & Associates
7005 Middlebrook Pike
Knoxville, TN 37909

West End Orthopaedic
1400 Johnston-Willis Dr
Richmond, VA 23235

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Joseph Massie, III, Esquire (Bar No. 35472)
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Westlake Financial Srvs
Customer Care
Po Box 76809
Los Angeles, CA 90054

Westview Financial S
1068 Temple Avenue
Colonial Heights, VA 23834

Massie Law Firm, PC
Joseph Massie, III, Esquire (Bar No. 35472)
115 N. 1st Street
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